



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 13, 2022

BY ELECTRONIC MAIL

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**Re: United States v. Robert Hadden,
S2 20 Cr. 468 (RMB)**

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the Government hereby provides notice that if the Court permits Dr. Goodsell to testify about memory-related issues, the Government may call as an expert witness at trial Dr. Lisa Rocchio, a clinical assistant professor of psychiatry and human behavior at the Alpert Medical School of Brown University. The Government reserves the right to call additional expert witnesses and will promptly provide notice if the Government elects to do so.

I. Disclosure by the Government

Dr. Lisa Rocchio is the President of the Division of Trauma Psychology of the American Psychological Association ("APA"). Dr. Rocchio has practiced psychology since earning her Ph.D. in 1995, and she is currently a clinical assistant professor at the Alpert Medical School of Brown University, where she trains psychiatric fellows in providing psychotherapy with a focus on trauma psychology. Over the course of her career, Dr. Rocchio has obtained specialized training regarding, and has specialized her clinical and forensic practice in, the assessment and treatment of patients who have experienced traumatic stress and interpersonal violence (which includes but is not limited to rape, sexual assault, childhood sexual abuse, intimate partner violence, and sexual harassment). In the last twenty-three years, Dr. Rocchio has assessed and/or treated hundreds of victims of trauma, many of whom were victims of sexual abuse. She has written, presented, and taught about the assessment and treatment of trauma, among other topics. Since 2014, Dr. Rocchio has been on the editorial review board of the APA journal *Trauma Psychology: Theory, Research, Practice and Policy*, and she is a fellow of the APA and a member of the APA Ethics Committee. As specified on the enclosed index, a copy of Dr. Rocchio's

curriculum vitae is being produced to you today bearing Bates number SDNY_RH_00065950-61, along with certain other materials.¹

Dr. Rocchio is expected to testify, based on her relevant education, skills, knowledge, training, and experience to the following: Relationships of trust can develop between a doctor and his patients over the course of a doctor's treatment of his patients due to a variety of factors, including but not limited to the power differential inherent within the doctor-patient relationship; reliance on the doctor's authority, profession, expertise, education, and medical training; the institution with which the doctor is affiliated; the nature of the medical care and medical advice provided; vulnerabilities associated with seeking medical care; and the patient's background and experiences. Relationships of trust, including those between a doctor and a patient, can contribute to difficulties with the patient's recognition of experiences of abuse, labeling it as abuse, and disclosing it to others. The fact that a patient may be reliant on the physician for ongoing medical care may also contribute to and exacerbate such difficulties. Victims in relationships of trust therefore may not identify themselves as victims of abuse, and victims who are sexually abused by their doctors in particular may not recognize certain acts as abuse because they are committed during the course of purported medical care, may question whether what they experienced was abuse, may not identify themselves as victims of abuse while the abuse is ongoing or after it has ended, and may not recognize the consequences of that abuse until a later point. Dr. Rocchio is also expected to testify that delayed disclosure—which refers to disclosing sexual abuse at a time after the abuse has occurred—is common among victims of sexual abuse for a variety of reasons, including but not limited to confusion, fear of backlash, self-blame, shame, difficulty labeling the experience as abuse, fear of not being believed, lack of access to alternative sources of medical care, and the relationship with the perpetrator. Memory and disclosure of traumatic or abusive events is impacted by a number of factors, including but not limited to the circumstances surrounding the trauma and the details that the victim assigned importance to and attended to during the assault. Dr. Rocchio has not evaluated any specific victim in this case, and the Government does not presently intend to offer Dr. Rocchio's testimony regarding any specific victim.

¹ Dr. Rocchio has previously testified in state and federal court and has been deposed in the course of federal and state litigation. As a courtesy, a list of that testimony is also being produced to you today bearing Bates number SDNY_RH_00065962.

Dr. Rocchio's expected testimony relies on her education, skills, training, knowledge and experience in the field of psychology, as well as her specialized expertise in the field of trauma psychology, which includes but is not limited to the areas of traumatic stress and interpersonal violence (including rape, sexual assault, childhood sexual abuse, intimate partner violence, and sexual harassment). This experience includes Dr. Rocchio's extensive clinical experience assessing and treating individuals who suffered sexual abuse and trauma, as well as Dr. Rocchio's experience conducting forensic psychological evaluations of people who have experienced sexual abuse and trauma. As a courtesy, the Government is producing notes from the Government's interviews with Dr. Rocchio as well, bearing Bates numbers SDNY_RH_00065981-82.

Very truly yours,

DAMIAN WILLIAMS
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by: s/ _____
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